

DOT-12 12124

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Tuesday, January 5, 1999

Ms. J. Suzanne Hedgepeth  
Director, Office of Hazardous Materials Exemptions & Approvals  
Research & Special Programs Admin.  
Department of Transportation  
400 7th Street  
Washington, DC 20590

Dear Ms. Hedgepeth:

This letter is to clarify how Albemarle is complying with a requirement in DOT Exemption 12124 under the section 7. c. Operational Controls. This is to assure that there is no misunderstanding later that might arise through some inspection.

This exemption requirement notes that "[T]he bottom valves must be blind flanged during transportation." This requirement is to assure that the bottom valve has a dual closure and is often required on portable tanks for liquids where there is concern for leakage. In this case the material in the tank is a solid. In view of this, the tank has two product outlets equipped with valves. One outlet in addition to the valve is fitted with a threaded pipe located after the valve which will be sealed by a threaded plug. In the second case, the pipe opening after the valve is equipped with a **camlock** device which constitutes a sealed secondary product closure since the **camlock** must be engaged to open this device. As a result, both openings are equipped with "blind" secondary closures. We believe that this meets the intent of the DOT requirement and that other flanges do not need to be applied in addition which would result in triple closures for a solid material.

If you have any question on this arrangement, please contact me.

Sincerely,

  
Gordon Rousseau

cc: P. Olson  
C. Hochman

DEPARTMENT OF TRANSPORTATION  
DOCKET SECTION  
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